

FW: Drilling procedures for FL1 and FL2

Bernstein, Kevin to: Frank Brock Cc: "Smith, Brody", 'Barry Moon'

From: "Bernstein, Kevin" <BernstK@bsk.com>
To: Frank Brock/R2/USEPA/US@EPA

Cc: "Smith, Brody" <smithb@bsk.com>, 'Barry Moon' <bmoon@stny.twcbc.com>

History: This message has been replied to.

6 attachments





Well Drilling procedure FL #1 Revision 9-24-13.docx Well Drilling procedure FL #2 Revision 9-24-12.docx









10/23/2012 01:21 PM

Well 58.pdf.pdf 7" Plug & Abandon.pdf.pdf 8 .625 Plug & Abandon.pdf.pdf Gallery 10 Work Plan.pdf.pdf

Frank, we still have some open items in terms of the IIX for Finger Lakes. I had hoped to put an entire package together, but I would rather not sit on some stuff, so here are the drilling procedures to be used for FL1 and FL2. DEC has determined that similar drilling procedures are not confidential so we make no claim regarding confidentiality regarding these proposed procedures.

Also attached is a recently prepared well schematic for well 58. This drawing, similar to cross sections for which we have claimed confidentiality (granted by DEC), is confidential and proprietary.

Also attached are plugging cost estimates that were provided relative to Savona, but I would think apply just as equally to wells 33, 34, 43 and 44 at Finger Lakes. The costs could be a little higher because of some additional work DEC wants us to do but these estimates give you an idea of the order of magnitude of what it will take to P&A wells 33, 34, 43 and 44. The plugging cost estimates would not be confidential.



In the past, the DEC has determined that records are confidential and protected from public disclosure. Therefore, the

information above regarding well 58 should similarly be protected.

Barry is working on a revised MIT procedure in light of your comment regarding the Kansas procedure. Obviously, we want to make sure that this procedure satisfies you and Peter Briggs. The procedure will likely be similar to what was recently done at Savona. I think the procedures for Savona were prepared by PB Energy.

I think we recently provided you with a copy of the Gallery 10 work plan report we sent to DEC in April. In that report (attached), Appendix D, there is a procedure for a pressure test. DEC approved the procedure, with some requested tweaks, in an e-mail (attached) to Barry Moon on October 3, 2012. We will let you know when the test is done and provide those results. Please note that the DEC has determined that Sections IV, V and VI of the Gallery 10 report and Appendix D (the pressure test procedures) are confidential and protected from public disclosure.

You had also asked in your March letter whether it still was the plan to set the bridge plug as deep as possible in the production casing and have the well filled with cement from that point to the surface as the plugging plan for FL1, FL2 and well 58. That still is the plan. It is likely that DEC will not allow us to reuse well 33, so we will plug that one when we plug 34, 43 and 44. We still need to get you the plugging procedures for wells 33, 34, 43 and 44.

Kevin

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From: Barry L. Moon [mailto:bmoon@stny.twcbc.com]

Sent: Wednesday, October 17, 2012 12:49 PM

To: Bernstein, Kevin

Subject: Drilling procedures for FL1 and FL2

Barry

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----- Message from Barry Moon
 / Smoon@stny.twcbc.com > on Wed, 3 Oct 2012 16:39:46 +0000 -----

<Linda Collart <lacollar@gw.dec.state.ny.us :To</pre>

ter Briggs <psbriggs@gw.dec.state.ny.us>, Barry Cigich Office <bcigich@inergyservices.com>, "Bernstein, Kevin <BernstK@bsk.com> :cc

Re: Gallery 10 Work Plan for Pressure Testing Subject

Linda we will conduct the test with the additional requirements. Thanks Barry

Sent from my iPhone

On Oct 3, 2012, at 9:04 AM, "Linda Collart" lacollar@gw.dec.state.ny.us wrote:

> Barry, Mineral Resources staff has reviewed the work plan submitted with correspondence from Kevin Bernstein dated April 11, 2012 to Peter Briggs to evaluate Gallery 10 (which includes Inergy Midstream,

LLC wells 18, 52, and 57) with a hydrostatic pressure test. The Department approves the testing detailed in the work plan with the following additional requirements:

> 1. Inergy must use brine with the highest possible saturation percentage to conduct the test.
> 2. Inergy must use a chart to continuously record pressures on during the test instead of monitoring by taking pressure readings from a gauge.

> Inergy may conduct the test at any time.

> Please don't hesitate to contact me at (585) 226-5376 if you have any questions.